

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

SK/RCH/EMR/PP/MED F. #2019R00927

271 Cadman Plaza East Brooklyn, New York 11201

June 17, 2022

### By FedEx

César de Castro, Esq. The Law Firm of César de Castro, P.C. The District 111 Fulton Street - 602 New York, New York 10038

> Re: United States v. Genaro Garcia Luna Criminal Docket No. 19-576 (BMC)

#### Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note the enclosed discovery contains Protected Material and should be handled consistently with the Protective Order. <u>See</u> Dkt. No. 19. The government also requests reciprocal discovery from the defendant.

# I. <u>The Government's Discovery</u>

# Enclosed please find:

| 0001140426-0001140448  | Documents received from BNY Mellon         |
|------------------------|--|
| 00011440449-0001140459 | Documents received from BNY Mellon         |
| 0001140460-0001148940  | Documents received from Citibank           |
| 001148941-00011148947  | Documents received from CMG Capital        |
| 0001148948-0001163307  | Documents received from City National Bank |
| 0001163308-0001163391  | Documents received from DG Resources       |

| 0001163392            | Documents received from Federal Reserve<br>Bank of New York   |
|-----------------------|---|
| 0001163393-0001164706 | Documents received from Helm Bank   |
| 0001164707-0001164708 | Documents received from HSBC  |
| 0001164709-0001164710 | Documents received from HSBC  |
| 0001164711-0001164712 | Documents received from JP Morgan Chase   |
| 0001164713-0001164801 | Files from the defendant's Apple desktop computer   |
| 0001164802-0001165035 | Documents received from Regions Bank  |
| 0001165036            | Documents received from Standard Chartered<br>Bank  |
| 0001165037-0001165119 | Documents received from TDG Lending   |
| 0001165120-0001165164 | Documents received from University of Miami   |
| 0001165165            | Photobook photo   |
| 0001165166-0001165182 | Notes reflecting prior statements of a certain individual   |
| 0001165183-0001165187 | A draft transcript of a telephone call made<br>from the Metropolitan Detention Center on<br>December 29, 2022, the recording of which<br>was previously provided to you on March 1,<br>2021, Bates-numbered 001012332 |

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BREON PEACE United States Attorney

By: /s

Saritha Komatireddy Ryan C. Harris Erin M. Reid Philip Pilmar Marietou E. Diouf Assistant U.S. Attorneys

(718) 254-7000

# Enclosures

cc: Clerk of Court (BMC) (via ECF) (without enclosures)